

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-v-

S1. 07 CR. 961 (LBS)

OLIVIA JEANNE BOWEN,
NOEMI DODAKIAN, DAVID NORMAN,
ROBERT INGRAM, and CHONG SHING WU,

Defendants.

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SENTENCING MEMORANDUM

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1. Introduction

This memorandum is respectfully submitted in support of the upcoming sentencing of Noemi Dodakian. Prior to the events surrounding her conviction, Mrs. Dodakian led an exemplary life dedicated to her family, church and community. We ask the Court to consider her outstanding attributes, documented herein by those who know her best, and to consider them in arriving at a fair and just sentence.

2. The Law

In United States v. Booker, 543 U.S. 220 (2005), the Supreme Court invalidated the statutory sentencing provision formerly set forth in 18 U.S.C. § 3553(b)(1) which made the application of the sentencing guidelines mandatory. Id. at 260-262. In subsequent decisions, the Supreme Court made it resoundingly clear that a trial court retains the discretion to impose “reasonable” sentences outside of the Sentencing Guidelines. See Rita v. United States, 551 U.S. 338 (2007); Gall v. United States, 552 U.S. 38 (2007); Kimbrough v. United States, 552

U.S. 85 (2007). To quote directly from Rita, the Guidelines, “insofar as practicable, reflect a rough approximation of sentences that might achieve § 3553(a)'s objectives.” Rita v. United States, 551 U.S. at 350.

As previously mentioned, the sentencing courts have discretion to impose a reasonable sentence irrespective of the Sentencing Guidelines. In United States v. Cavera, 550 F.3d 180 (2008), the Second Circuit held that a deferential “abuse-of-discretion” standard will apply upon review of a sentence. United States v. Cavera, *supra* at 189. The overriding factor is for the Court to impose a “reasonable sentence” based upon the factors enumerated in 18 U.S.C. § 3553(a).

18 U.S.C. § 3553(a)(2) requires this Court to impose a sentence “sufficient, but not greater than necessary” to fulfill the sentencing objectives of Congress. Those objectives include, among others, punishment to the offender, affording adequate deterrence to criminal conduct, and the protection of the public from future crimes by the defendant, *inter alia*. See 18 U.S.C. § 3553(a). Section § 3553(a)(i) also requires that the sentencing Court consider “the nature and circumstance of the offense, and the history and characteristics of the defendant.” It is our hope that a close look at Noemi Dodakian’s background, experiences and character, as set forth in the attached letters demonstrating the close ties to her family, church and community, will assist the Court in fashioning a fair and just sentence for her.

3. Family

As set forth more fully below, Noemi Dodakian is, first and foremost, deeply devoted to her family. The family is extremely close. She has been married to Aram Dodakian for forty years, and the couple have two loving children, Haig and Lisa Dodakian, both of whom

have submitted letters attesting to the strength and support received from their mother. Noemi's commitment to her family is the bedrock of her existence and the source of her strength. The time she must now spend in prison, far removed from their loving embrace, will serve as a severe punishment for her crimes.

One of the themes of Noemi's life has been her unflagging dedication to her children. Mrs. Dodakian was always heavily involved in their education and extra-curricular activities. Her daughter, Lisa, wrote:

My mom always made sure to be very involved with her children's school studies. She chaperoned every field trip for us that she could, she was an active PTA member, she volunteered at all the school events that she could, and she was my brother's cub scout leader.

See Exhibit "A" – Lisa Dodakian; see also Exhibit "B" – Aram Dodakian; Exhibit "C" – Haig Dodakian; Exhibit "D" – Lily Sarkasian.

When Lisa decided to take up the violin, Noemi drove Lisa to the lessons, sewed clothing as a part-time job to earn the money to pay for them, and even learned the basics of the violin herself in order to assist Lisa. See Exhibit "A" – Lisa Dodakian. The letters from Noemi's family are replete with examples of this type of commitment. Mrs. Dodakian was consistently volunteering to chaperone field trips, serving on the PTA, and driving both children to soccer, baseball, basketball and karate practices multiple times per week. To pick just one example, her husband Aram wrote:

She taught Lisa how to teach violin lessons to other students and drove Lisa and Haig to Christian schools on Saturdays to learn the Bible.

See Exhibit “B” – Aram Dodakian. See also Exhibit “A” – Lisa Dodakian. Haig echoed his sister Lisa with regard to his mother’s devotion:

She had helped me with my homework throughout grade school, and even into college. She was always there to drive me to sports practices, and be supporting of my academic and extracurricular goals.

See Exhibit “C” – Haig Dodakian. This single-minded devotion to her children was noted by Noemi’s brother, John Najarian, who wrote:

She devoted much of her time to her children’s education. Her daughter is accomplished in violin playing and academics thanks to countless hours she dedicated to her education, graduating recently from Vassar. She was likewise supportive in her son’s education. He is going on to pursue a career as a Physician’s Assistant.

See Exhibit “E” – John Najarian; see also Exhibit “D” – Lilly Sarkasian.

By way of example, each of Mrs. Dodakian’s children wrote about one incident involving their mother which had special meaning to them. In Lisa’s case, it was the way her mother took care of her after suffering a serious injury in a devastating car crash.

She helped me get out of bed every day, helped me walk, sat with me as I cried through the severe pain, took me to the ER when the pain was beyond unbearable, and spent hours on end taking me to the chiropractor and any method that she could find to help. She drove me to and from college for the parts of the semester where I couldn’t move enough to drive and sat in the car waiting for me to finish my classes, and then drove me home.

See Exhibit “A” – Lisa Dodakian.

Her son, Haig, noted that even during the intense final weeks before trial, Noemi asked the Court for special permission to travel to Albany in order to accompany her son on an interview for an academic program to train as a Physician's Assistant. See Exhibit "C" – Haig Dodakain. Even now, though incarcerated, Noemi attempts to help her son with his graduate school applications.

Even currently, she is still trying her best to keep up with my status on graduate school applications. I could not imagine a more devoted mother, especially after all that has happened after. Noemi has helped my sister in the same ways she has helped me in my sister's upbringing as well.

See Exhibit "C" – Haig Dodakian.

Mrs. Dodakian's commitment to family extends well beyond her husband and children. Shortly after she was first married, she took into her home her husband Aram's father. According to Aram, she took care of his father, "as if he were her own father." See Exhibit "B" – Aram Dodakian. She did the same for Aram's elderly mother when she also came to live with them in 1978. Aram Dodakian wrote:

My wife was there for my elderly mother, who needed 24-hour care. My caring wife looked after my mother as if she were her own mother for 26 years, up to the time my mother passed away. She took my mom shopping, to lunch and to her doctors' appointments. She created a record book of all doctors' notes, medical history and medications, took total charge of the many medications and medication refills my mother required, cooked for her, bathed her, personally cut and styled her hair, gave her manicures and pedicures. Most importantly to my mother, she was a warm, loving and uplifting companion when I was working as a consultant for Pfizer in Peapack, NJ, which is 100 miles away from my home in Connecticut.

See Exhibit “B” – Aram Dodakian. Noemi’s niece, Grace Gilmartin, also noted the loving care and attention provided by Noemi:

My grandmother was always grateful for Noemi’s care. Not many daughter-in-laws would take care of their mother-in-law in such a way, let alone a crippled mother-in-law, in the same house, for twenty-five years. I think this in itself speaks volumes about Noemi’s character.

See Exhibit “F” – Grace Gilmartin; see also Exhibit “D”- Lily Sarkasian; Exhibit “E” – John Najarian; Exhibit “G” – Lucy Bourghol; Exhibit “H” – Marie Murro.

As this Court may recall, members of Noemi’s family were present throughout the long dark days of her trial. Of note, Noemi’s sister, Lily Sarkasian, attended each and every session. As noted in her letter, Lily’s devotion to her sister is borne of Noemi’s dedication and commitment to the family:

Noemi has always been unselfish and caring. For many years while we were growing up, she took care of her four siblings since our father passed away when we were young and our mother had to go to work to support us. When she got married and had her own children, she was a devoted, loving and caring wife and mother. For many years she took care of her elderly father-in-law and sick mother-in-law. For the last two years, she has helped take care of our handicapped mother, who is a stroke victim.

See Exhibit “D” – Lily Sarkasian.

Noemi Dodakian’s family is there for her as she has been their strength for so many years. This will provide her with the strength and support to move forward with her life both now, and upon her release from prison. It should be an important factor for the Court to consider when imposing sentence.

4. Religion

As indicated by the attached letters from fellow parishioners, Noemi is strongly tied to her church. The church is the strongest pillar of her community and the foundation of her beliefs. She embraces religion wholeheartedly and its teachings inform her values. She has raised her children to follow its teachings and to have the Church as an important part of their lives. Noemi served as a teacher in a religious school for years before having a family of her own. Her current Pastor, Alfred F. Van Geersdaele of the First Assembly of God in Brookfield, Connecticut, wrote: "...I have experienced her as a woman of deep faith, and a profound trust in God." See Exhibit "I" - Alfred F. Van Geersdaele.

Each and every friend who contributed a letter noted her firm religious faith. A long-time friend and fellow churchgoer, Florence Pilkington wrote:

During the seventies [I] found Noemi to be friendly and a faithful person. Every week she brought her elderly in-laws to church. When we renewed acquaints [sic] in two thousand, [I] found her kind, compassionate and loving.

See Exhibit "J" – Florence Pilkington.

Sarah Castro, Mrs. Dodakian's friend of twenty-nine years, also stated: "[Noemi] has always been a person of impeccable character and integrity." See Exhibit "E". Mrs. Dodakian and Ms. Castro met when Noemi was teaching Ms. Castro's daughter at a Christian school in Connecticut. Similarly, another fellow churchgoer, Virginia Vassak, wrote: "I have always known [Noemi] to be a compassionate, considerate, sincere person, and a loving caring mother and wife. I know her to be someone who is always willing to help people." See Exhibit "K" – Virginia Vassak.

Mrs. Dodakian also contributed both effort and money to every Church in which she worshipped Her husband wrote:

Noemi taught in a Christian school in New Jersey and donated part of her salary back to the school. Students at all levels had to wear uniforms, but there were several students in her school that were not able to afford buying the uniforms. Noemi had compassion for those parents, and personally sewed the uniforms for those needy children in her school.

See Exhibit “B” – Aram Dodakian. She also visited ailing parishioners in an attempt to bring the church and the community together. Her friend and fellow churchgoer, Noelline Morin wrote:

[Mrs. Dodakian] also visited my brother who was struggling with health issues at the time, tried to help him out even shared equipment so he would be more comfortable and help improve his condition.

See Exhibit “L” – Noelline Morin.

Even though incarcerated, Noemi, maintains her religious commitment and, indeed, she has become a regular participant at religious services. A leader of the services at the Metropolitan Detention Center, Elene Mitchell, wrote:

I have the blessing of hosting Bible study class, praise and worship services with Mrs. Dodakian, she is a true blessing to the women on the unit.

See Exhibit “M” –Elene Mitchell.

Mrs. Dodakian’s participation in MDC religious services has led her to help many of the inmates who worship along side of her. One of those inmates, Sherrell Footman, wrote

about how Noemi is helping her overcome dyslexia. She and Noemi read Bible passages together which has inspired Mrs. Footman to become a better mother. Mrs. Footman wrote:

Ever since I have met Sister Noemi, she has really inspired me, and encouraged me to do better for my children, and to take good care of my children. She has also been teaching me how to read better because I have dyslexia. We are using the holy word of God, the Bible as our book. She has also been helping the other women in here in uplifting and encouraging them. To me, sister Noemi is like a mother that I never had, and she is a beautiful soul with a beautiful heart who really does care about other people in their lives. Me being a mother of three, knowing how much my children and family need me, I know that her husband and children need her too, especially her husband who has become very sick. We has (sic) been praying him. Sister Noemi has been a blessing to me. I look up to her as a holy woman of God. We young women of this world need more people like her.

See Exhibit "N" –Sherrell Footman.

Mrs. Dodakian's commitment to the Church is evidence of her desire for self-improvement, and her appreciation of the concepts of fallibility and redemption. Her devotion to the Church will also provide her with a foundation upon her release. These factors should be considered in her sentencing.

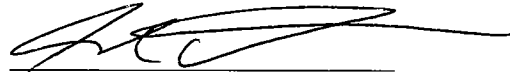
5. Conclusion

By all indications, Noemi Dodakian is a most unusual criminal defendant. She has outstanding qualities and has been of great benefit to so many in her family and community. Yet, there is no denying that she has strayed from the path, and committed the crimes for which she must now be punished. She respectfully requests that the Court balance the good she has done, and will continue to do, even in prison, with the harm she has caused in

fashioning a sentence which is “sufficient, but no greater than necessary.” See 18 U.S.C. § 3553(a).

Dated: New York, New York
February 25, 2011

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'R. Stavis', written over a horizontal line.

Roger L. Stavis (7666)
Adam M. Felsenstein (1755)

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Exhibit A

Lisa Dodakian
27 Jefferson Drive
Ridgefield CT. 06877
January 16, 2011

Dear Honorable Judge Sands,

My mother, Noemie Dodakian, is the single most important person to me in the world. She is my best friend, my guiding light, my joy, my everything. Without her I am completely lost, broken, saddened beyond belief, hopeless, and torn. She is the kindest, most giving, most honest, most fair, and most selfless human being I have ever and will ever know. She doesn't possess a bad bone in her body, and I know for a fact that she would never ever lie, steal, or cheat – all false accusations made during the trial. The sacrifices she has made for others are endless. She has always given more of herself than she ever needed to and more than anyone else would ever give. She stands firmly on her Christian beliefs and has raised my brother and I in the same fashion. All the good in me has come from the inspiration she has been. Let me give you a peek into the glorious heart of Noemie Dodakian who has been wrongfully convicted of this crime. She cares so dearly to help others that no one could even fathom how someone could have such a selfless and giving heart as she. She truly believed that she was helping people in this case, I saw her go through it every day. She was the biggest victim hurt by this case – definitely not the cause. She gives of herself until her heart bleeds open, then she keeps giving more.

Where do I begin telling you about what my mother has done for me and others? In the 27 years of my life, not a single day has gone by when we were together that she has not spoken with me multiple times throughout the day. Even now she calls and emails me every day. The bond between her and I is extremely strong. She is my life.

My mother stayed at home to take care of my brother Haig and I ever since we were born. Family has always been the most important thing to her – a value she has taught me well. My father worked as a computer engineer while my mom took care of the household and children. She was extremely frugal and taught us that it was a sin to waste money. We had just enough to cover our needs because my mom was very careful with our budget and my father worked very hard. When I was in elementary school and middle school, she would often sew special clothes for me that we would design on patterns because it was an activity that brought us together and saved money. There has not been a single day that my father has not worked in his life. No one works harder than him. He would always work at his job all week long then come home and work on our house on nights and weekends because we never had extra money to spend to hire help. My parents taught me to do as much myself as I possibly could do to save money. That's the type of honest and frugal people my parents are. My mother was never extravagant in any way, shape, or form. She would do for others before she even gave a thought to doing for herself.

My mom drove me to violin lessons several times a week from the age of three until I graduated high school. She sat with me through every single violin lesson, theory class, group

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class and audition, chaperoned violin camps, and took me to orchestra and chamber music events. She paid very close attention to my teachers methods and my progress so she could coach me through my practice sessions at home, as she did for hours on end each day. She was an amazing motivator and inspired and encouraged me to be a meticulous violinist and taught me how to practice. While I was practicing for concerts, solos, and national auditions, she would stay up with me until the early hours of the morning helping me with the trouble spots. I also took piano lessons in elementary school through middle school. She came to the lessons with me and practiced alongside me as well. She found a way to involve my brother and I in Saturday Bible school and sports as well. She came to every single one of my practice sessions and games when I played baseball and soccer in elementary school and took me to Bible study classes on Saturdays at a Christian church we belonged to. She did the same with my brother Haig for his violin lessons through elementary and middle school, baseball, soccer, and basketball games, Saturday Bible school, and karate lessons. My mother also sat with both my brother and I every day after school and did our homework with us and helped us study for every quiz and test. She was the most caring, meticulous, and kind woman ever.

Her coaching made such a positive impact on me that I decided to begin teaching myself. My mom gave her time to teach Sunday school at various churches over the years. I would stand in every single class she taught and admire how well she was able to connect with the children and inspire them. I wanted to be just like her. I learned everything I know about teaching and life from her. My mother's teaching skills were spectacular and she was a nursery school teacher before I was born, so she understood how to teach and inspire young children. I began teaching young elementary school beginners violin lessons with my mother's help. She helped me teach, came with me to my students' houses for lessons, and chatted with the students' parents. She helped me help others by showing them the beauty of the violin. We did it together as a team. We always did everything together as a team.

Along with teaching violin, I began working in product demonstrations to earn my spending money in high school and into college. My mom would spend the weekends driving me to my jobs, helping me memorize the product facts to help me sell the product, standing with me and help me with demonstrations, sending people my way in the store, and waiting for me. When I was in high school, she would always come with me to make sure I was safe and all went smoothly, and she drove me at times when I was in college as well. She put all her work aside to drive me there. I always wanted her with me, she was my best friend and I didn't have to go through anything without her. She was my backbone. When I was younger, we always used to joke that I was her "tail" because I followed her everywhere she went. I looked up to her like none other and I still do. It breaks my heart that she is not with me.

My mom always made sure to be very involved with her children's school studies. She chaperoned every field trip for us that she could, she was an active PTA member, she volunteered at all school events that she could, and she was my brother's Cub Scout leader. She always gives to others less fortunate, like taking our clothes to poor families with children in the local churches, sending clothes to missionaries overseas, and taking our clothes to the Salvation Army up. She tithes every single week to the Church because that is the right thing to do. Even if it put us on an extremely tight budget, she always said that "God will provide if we do what is right by Him". She never wastes anything – not a piece of food, a single red cent, an article of clothing – nothing at all.

During my middle school and high school years, I was the victim of sudden severe back pain. Doctors didn't know what was wrong with me and all they could do was point me towards physical therapy, which my mother took me to for years on end yet it didn't seem to help the

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problems. My mother was so very hurt by seeing me endure such pain. I had to stay home from school for days, sometimes weeks. She drove me to and from school every day through the end of my high school years because the bus would give me bad back pain from the shaking. She did everything she could to help me, she would spend every moment of the day with me to comfort me, found and took me to new doctors and health professionals that may be able to help me, and researched every method possible. That's how she found Nikken Magnets and started working with them – because was searching for some kind of solution to my pain and the magnets helped me so much that she wanted to be able to share this with others who could benefit from it. She cared so deeply to help everyone around her, whether she knew them or not. She has a heart of gold.

While she was taking care of my brother and I she was also taking care of my dad's mother. My grandmother Paris suffered from severe rheumatoid arthritis and my mother voluntarily took on the responsibility of taking care of her. Paris lived with us and my mother gave her the 24 hour care that she needed taking her to doctors, bathing and dressing her, feeding her, walking with her, taking her out, and keeping her company. My mom never needed to do this as my grandmother was quite difficult to deal with. However my mother knew it was the right thing to do and she happily took on this overwhelming responsibility from the time when I was born through the end of my grandmother's life in 2004.

My mom also took exquisite care of her mother Alice, always visiting her in New Jersey while she was well and spending time with her each week. The past few years, Alice suffered from a series of silent strokes which almost killed her and left her unable to talk, walk well, respond, or make any decisions on her own. Alice needed 24 hour care and couldn't ever be left alone. My mom would always drive an hour and twenty minutes to her mom's house and spend days there to take care of her mother. When she was unable to leave the house because of the case, she would go during the hours she was allowed to be out of the house to go take care of her mother, or go pick her mother up and bring her to our house in order to closely take care of her for days on end. She did this right up until the trial, even though she was so overwhelmed with so much else to do. She would always find a way to be there for her family. She gave her time – her most precious gift – to all those she loved. She is the sweetest angel God has ever placed in this world. It breaks my heart to see what has happened to her. Her mother Alice is not going to be alive much longer with all the health problems she has, and we have not been able to tell her what has been going on with the case and my mom not being here. This is because she would easily have a stroke from how upset she would get. She misses her daughter so very much and doesn't know why she hasn't seen her. My mom has always been there for her mother her whole life, and if she is kept away she will never see her mother again and hold her hand during her last days.

My mom always helped out others in need to which she had no obligation, from the goodness of her heart. I remember when a friend she had met at a business gathering called her from Orlando, Florida. He had taken his family of three children to Disney World. While he was driving from Atlanta his car broke down and he had to pay for its repairs with his vacation money and had no money left for food and tickets for three days. My mother sent him \$340 by Western Union and did not expect that he could pay it back and he did not. I went with my mother to the supermarket to send it and saw the receipt. Another lady friend of hers was in Wyoming visiting her son and was delayed and had no money left. She called my mother for help and my mom sent her \$100 right away. This friend, Gayle Bradshaw, could not return the money and mom said that she did not expect her to.

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When I was 20 in college, I had a terrible car accident where a drunk driver hit me. My back went into such severe spasms for years after the accident that I had to move back home and my mom took care of me. She helped me get out of bed every day, helped me walk, sat with me as I cried through the severe pain, took me to the ER when the pain was beyond unbearable, and spent hours on end taking me to the chiropractor and any method that she could find to help. She drove me to and from college for the parts of the semester where I couldn't move enough to drive and sat in the car waiting for me to finish my classes, and then drove me home. That was a 75 minute drive one way that she did for about two months, sacrificing three days a week for me like this. We didn't have extra money beyond our needs, and besides my father cashing in all his IRA's to send me to college, my parents had to take money out of the equity of our house to pay for my college tuition and my brother's. So my mom cut as much as possible out of our budget to reappportion the family's finances to give me the care I needed to function. Not only was this a tremendously difficult time for me physically but it was also a very difficult time mentally. My mom was always there for me to talk to. She always made the time to spend with me to get my mind off of the severe pain I was dealing with.

Because of how much she cared to help me find a way to cure my pain, she inspired me to want to help others find a way to get out of their pain. This is why I entered the health field. My mom was always so concerned with helping others and I saw the tremendous joy it would bring to her when she would help others find the answer they were looking for. I too wanted to create this joy. I didn't give up on our quest to find a way to get out of my back pain. I various corrective exercise methods and joint mobility work that healed me more than anything else ever did. My mom always taught me to help others who are less fortunate and to always be thankful and grateful to God for everything. I followed in her footsteps and now I work as a joint mobility and rehabilitation specialist as well as a personal trainer and strength and conditioning coach. I help people from their mid 40s through their 70s recover from physical trauma, pain, restricted mobility, and much more. My mom was a nutritionist, so together, we were a dynamic duo. I always had aspirations that my mom and I would work together in this field.

My mom was always there for me emotionally. When I would go through the ups and downs of life, she was the only one always by my side. She made the time to talk with me, lift my spirits, take me to church, read the Bible to me, go to the movies with me, do errands with me, rent movies with me, anything and everything. She taught me to have fun without spending much money because time well spent is spent with the people you love, not with things.

During the past few years ever since this case came about, our finances have been extremely tight. So I decided to move back home to help my parents make ends meet instead of being out on my own, building my own business and living my own life, and taking care of my own set of bills. I folded my successful personal training business that I created in New York City and moved back home to be there emotionally and financially for my mom. At the age of 24, just starting my career, I gave my parents much of my hard-earned money to make their ends meet. My father was working harder than anyone his age should have to be working, and he was unable to retire because he spent his savings on my brother's and my college tuition. The remainder of anything he had was given to the lawyer for this case and there was simply not enough left for us to live on. I had emptied my bank account out once for my family and gave them large amounts of money over the past two and a half years, which has not allowed me to be able to financially take care of myself. I don't make much and it took me years of work to

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give my parents what I did so we could have a roof over our heads, keep food on the table, and heat in the house. We were not extravagant in any way shape or form, as the government accused us of being. I gave all I could possibly give to keep this family afloat. The wrongful accusations of millions of dollars that my mother had supposedly taken are absolutely absurd. We are now losing our home because our mortgage is \$840,000 since our last refinance to get the money for the lawyer, as we can no longer make our mortgage payments between my father and I. We simply cannot afford it. We gave all we had into keeping our house and paying our bills and we cannot do it anymore. My father worked hard for every penny he brought home, and I helped out as much as I could, which wasn't much in the grand scheme but it was all I could do. So now at 27 years old I can't even attempt to build a life of my own because of how much I have helped out my parents financially. We are proud of how hard we worked and how we earned everything that we have. The government wrongfully accused of buying luxury cars when the truth is that my father bought a 2005 standard 4cylinder Honda Accord, which unlike the government said, is not a luxury car in any way, with his own hard-earned money. I drove a 2002 standard 4cylinder Honda Accord to drive to college and work. My brother and my mom had to share an old, barely working 2000 Cadillac that they bought used many years before, and we had to spend a lot of money to fix it so that it would be in working condition. The car had so many problems that it could not be driven far, so they had to drive it the least possible that they could because we could not afford another car if anything happened to it.

Affording just the lawyer was the absolute limit that my father could possibly do because we knew we had to bring justice to this wrongful accusation made against my mother. We had no extra money to bring witnesses or hire a forensic accountant of our own to prove that my mom did not keep any money. She was a victim; she and my entire family were the biggest victims of all. We had lost much money in these investments as well and with the wrongful accusations, the prosecution has done all they can to rip apart our family and our lives. She is merely a victim of prosecutorial politics because no one would believe how wonderful, giving, honest, helpful, and kind woman she is and what an upright family we are. We have nothing left now and are in a position where we can no longer afford our expenses to live. If only you could spend a day with us to see how we live, who we are, what our lives have become due to this catastrophe that we were victims of, you would see how we deserve none of this. My mother would be giving of herself, her time, and her knowledge to her community, to her church, to her children, to her family, to her husband, to everything that has meant something to her throughout her life. She is unable to make this positive difference if she is not here with us. She is a hard worker and is in **no way a threat to society**. Nothing would be a bigger injustice and tragedy than to put my mother in jail, whose generosity, honesty, integrity, and willingness to help others in need has been manifested over and over again throughout her entire life. I am falling apart at the seams without her. I am so sad I cannot bear waking up each day to such injustice and destruction. My brother is extremely saddened. My father's health is suffering tremendously, I've had to have him go to the ER twice over the past two weeks, he is developing heart problems from the unbelievable stress, he's in a terrible depression, he can't focus and function at work and his job is now on the line, and he cannot bear to see his wife and his family treated so wrongfully. He is 68 years old, my mother is 64. They built this life together, this family together, and he has become exceedingly sick without her. My family is all I have. We are honest people. My mother does not deserve this. She has led a selfless life for her family. I beg you, to please see the truth, to see the beautiful woman, the real Noemie Dodakian, and I would give my life to have her here at home with me my family, where she belongs.

January 16, 2011
Page 6

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Dodakian". The signature is fluid and cursive, with the first name "Lisa" and last name "Dodakian" clearly distinguishable.

Lisa Dodakian

Exhibit B

Aram Dodakian
27 Jefferson Drive
Ridgefield CT. 06877
January 3, 2011

To whom it may Concern:

I am writing on behalf of my wife Noemie Dodakian, who has recently been convicted in federal court.

I have been married to Noemie Dodakian for 40 years. Throughout all these years Noemie has always been an exemplary wife and mother to both my daughter Lisa, and my son Haig Dodakian. I cannot in any way condone the fraud of the Robert Ingram, and Jim Norman scams, but I know that Noemie was blind to the fact that these programs were not real. She honestly believed that she was helping people get out of difficult financial situations, because of the returns that were promised to her by the masterminds behind these two programs.

Noemie is a caring person. She is compassionate and has a golden heart. One year after we were married on November 1, 1970, my father who was 70 years of age, asked me if he could come and live with us. At the time we were living in a one bedroom apartment in northern New Jersey. My wife let my father come and live with us, and she took care of him as though he was her own father. My father was sleeping on a sofa since we did not have a separate bedroom for him.

Later on we moved to South Jersey, and in 1978 my mother came to live with us as well. At that time we moved from New Jersey to a house in Connecticut. My mother was 65 years old. My father passed away in 1983, he was 83, and my mother passed away in 2004, she was 92. My wife unselfishly took care of my father, and my mother who became an invalid in her later years because of severe rheumatoid arthritis and could neither dress herself, nor take a shower or a bath by herself. My wife was there for my elderly mother, who needed 24-hour care. My caring wife looked after my mother, as though she was her own mother for 26 years, up to the time when my mother passed away. She took my mom shopping, to lunch and to her doctors' appointments. She created a record book of all doctors' notes, medical history and medications, took total charge of the many medications and medication refills my mother required, cooked for her, bathed her, personally cut and styled her hair, gave her manicures and pedicures. Most importantly to my mother, she was a warm, loving and uplifting companion when I was away working as a consultant for Pfizer in Peapack, NJ, which is 100 miles away from my home in Connecticut. This is the kind of caring, generous, compassionate and loving person she is and always has been. She has a kind and giving heart, and is always there to wholeheartedly help people.

Noemie always wants to help people in need. Noemie taught in a Christian school in New Jersey and donated part of her salary back to the school. Students at all levels had

Noemie Dodakian
January 3, 2011
Page 2

to wear uniforms, but there were several students in her school that could not afford the uniforms. Noemie had compassion for them, and personally sewed the uniforms for those needy children in her school. Noemie has always contributed generously to every church organization which we have attended and taught Sunday school in several churches.

Noemie has always been a dedicated and an exemplary mother. She went through 3 major and 3 minor surgeries to have children after 13 years of marriage. She was in a local support group helping other couples in similar situations. She was extremely close to out two children, Lisa and Haig, since they were young. Noemie always spent time with Lisa and Haig and assisted them with their school work and that aspect of their life. Lisa and Haig started violin lessons at the ages of 3 and 5 respectively. Noemie had to learn the violin basics in order to continue practicing for hours with our children at home, and she used to drive both of them to their violin lessons to the outskirts of Norwalk CT two to three times a week, until Lisa was 18 years old. She volunteered with violin camps. She chaperoned and led field trips. She was on the PTA. She was frugal, and used the money she saved for their violin lessons. She drove and picked up Lisa and Haig every single day all the way from kindergarten through high school. She took Haig to karate lessons in Danbury three times a week. She also took Lisa to piano lessons for several years. Noemie took Lisa and Haig to baseball, soccer and basketball practices. She was always trying to find a remedy for Lisa's back pain. She took Lisa to physical therapy for years, after an automobile accident. She drove Lisa to chamber music orchestras where Lisa performed. She taught Lisa how to teach violin lessons to younger students and drove Lisa and Haig to Christian schools on Saturdays to learn the Bible.

Noemie is a very generous person. Noemie always volunteered in the public schools where my children were attending. When no mother was volunteering to take over the cub scouts, Noemie took over the Cub Scout leadership role and sewed flags and purchased all necessary equipment needed for the cub scouts, making all the arrangements for meetings and outings for the school children. She also volunteered on other occasions when teachers were short handed and needed extra help. Noemie has always been a wonderful volunteer, always willing to help out wherever she was needed. She takes her commitments seriously and has consistently followed through with any job that she has agreed to do.

Noemie is a sincere, warm, loving and caring person. It is not in Noemie's nature to hurt people. Her education was in Nutrition, Health and Teaching. She worked in helping people with problems that were not helped by conventional treatment. Many people benefited by the products she represented after she gave them a free trial period. She has always extended a helping hand and instilled the concept of caring for others in both Lisa and Haig. Lisa is a joint mobility specialist helping older people. Haig is applying to different Universities for a Physician's assistant Masters program.

Because of her trusting nature, Noemie has been blind to the fact that the Jim Norman and Robert Ingram programs were a scam, and did not realize that the people she dealt with on these programs were criminals. We are an honest family, and have never used other people's money for ourselves. Noemie kept detailed records of people who had invested, because she had nothing to hide, and was concerned that people get paid

Noemie Dodakian
January 3, 2011
Page 3

correct amounts due to them. She was expecting those people to get paid, as she was told by the evil masterminds of the programs she believed were real. Scammers do not keep detailed records, because they do not intend to return monies. She also returned monies to those needing it.

Noemie has been an exemplary wife. I have totally depended on Noemie for all the 40 years of my marriage. We are like one soul. I believe in her innocence. Noemie's character proves over and over again that she is not the devious person as she was portrayed in court. She is herself a victim of the lies and deceit of the criminals she was dealing with, who used her good and trusting nature, to achieve their evil goals. Besides my salary, which is substantial, we have spent all of my IRA's and have refinanced my mortgage to pay for Lisa's and Haig's education. Haig has a \$30,000 student loan. We also refinanced our house with huge amounts to pay for the legal fees in the defense of my wife. As a family, we are suffering from financial and emotional difficulties. We love one another very much, and the fact that she is not with me right now, has led me into a terrible depression. I have lost 20 pounds in three weeks. Yesterday I went to the ER because of chest pains. I am 68 years of age, and I am still working to support my family, as I have no retirement left. Lisa and Haig are worried about my health.

I hope that the court will consider my statements with respect to Noemie's true character, and generosity as it weighs in her sentencing.

Sincerely,

Aram J. Dodakian

Aram J. Dodakian

Exhibit C

Haig Dodakian
27 Jefferson Drive
Ridgefield CT, 06877
January 4, 2011

To whom it may Concern:

I am writing on behalf of my mother Noemie Dodakian, who has recently been convicted of a crime in federal court.

I have known my mother to be a caring and nurturing person since 1986 when I was born. She has been an amazing mother, and a loving wife to my father. I am heartbroken by the scams concocted by Robert Ingram and Jim Norman, and even more so that they have completely duped my mother by playing on her naivety. However, the real shame is how much it has crushed my entire family to be separated from Noemie. She was honestly trying to help out other people get out of difficult financial situations, and she believed every word of the scams that she would be able to help them as well as our family. These scams have left us crippled financially just as it had done to the other victims.

It saddens me to see her incarcerated after she has done so much good in her life for her family and the community. She was a Christian school teacher, and a devout follower of the religion; always paying tithe to the church and bringing her two children, Lisa and I, to attend Bible lessons and Sunday morning sermons. Noemie is not, nor was ever, a malicious or conniving person. I do not believe she is capable of knowingly doing harm unto others, as that would contradict her morals and beliefs that she has bestowed upon me throughout my upbringing. Despite her current situation, I still love my mother and know that she only had the best interest at heart for everyone, and never desired to hurt or scam people. She had helped me with my homework throughout grade school, and even into college. She was always there to drive me to sports practices, and be supporting of my academic and extracurricular goals.

Last summer my mom asked for special permission from the judge to be allowed to come with me to Albany, New York, for a Physician assistance open house program.

Even currently, she is still trying her best to keep up with my status on graduate school applications. I could not imagine a more devoted mother, especially after all that has happened to her. Noemie has helped my sister in the same ways she helped me throughout Lisa's upbringing as well.

Noemie helped out her mother-in-law, my grandmother, as an in-home caregiver for many years during my childhood as well. I know that most people would have put her in an old person home, but Noemie took care of her every day without fail. She just loved to help people, and it is a trait I do not see in many others. It is sad to be separated from my mother, and such an amazing woman who has always been there for me and the rest of her family. I believe that Noemie should be entitled to leniency because of the character she has been for so many years, and not the ruthless person she has been portrayed as. The allegations are hurtful to me as well because although she has been charged with wire fraud, I had to take out student loans to finish my college experience and we have been in a financial dilemma for over two years now. I

thank you for your time and consideration for reading this, and I pray it makes a difference in her sentencing.

Sincerely,
Haig Dodakjian

A handwritten signature in black ink, appearing to read 'Haig Dodakjian', is written over a long, sweeping horizontal line that extends across the page.

Exhibit D

Lily Sarkissian
21 Swan Road
Mahwah, NJ 07430
201-248-3222

January 3, 2011

RE: Noemie Dodakian

Honorable Sir,

The purpose of this letter is to provide a character reference for Noemie Dodakian and to plead for leniency on her behalf.

I am Noemie's younger sister, Lily Sarkissian, residing in New Jersey at the above address. I am a graduate of Queens College. I have 25 years experience in Information Technology Management.

I have known Noemie my whole life, over 50 years. She has always been an honest, caring and generous individual. She never smoked or drank liquor. She placed high importance on religion and education. She graduated from Queens college with a degree in Home Economics. She would always be helping people, whether it was related to health & nutrition or sewing & knitting or writing reports & homework. She would never harm anyone. She was always a highly respected person with good morals and integrity.

Noemie has always been unselfish and caring. For many years while we were growing up, she took care of her four siblings since our father passed away when we were very young and our mother had to go to work to support us. When she got married and had her own children, she was a devoted, loving and caring wife and mother. For many years she took care of her elderly Father-in-law and her sick mother-in-law. For the last 2 years she has helped take care of our handicapped mother, who is a stroke victim.

Her husband, Aram, an engineer, has always worked in high paying jobs and supported Noemie and their children. He paid for his children's college tuition together with student loans and additional mortgages on their home.

Noemie's involvement in these investment schemes is totally out of character for her. Five years ago when she started selling these private offerings she believed they were real. She did not know she was dealing

Lily Sarkissian
21 Swan Road
Mahwah, NJ 07430
201-248-3222

with con artists. She invested her own money as well as getting her family & friends to invest, and they got their families and friends to invest so they would all get lucrative referral fees at the end when the investment paid off. She was so naïve to believe that they would get such high returns for their investment. When she found out it was a scam, it was too late...they had all lost their money. She was just as much a victim as the other investors. She felt so bad that she tried to help some of the victims by sending them her own money and stock shares that she owned. But there was not enough to go around. I could see how she was suffering tremendously during this time.

For over 2 years after her arrest, she was tormented by the security ankle brace and the curfew imposed on her. She and her husband had to get a second mortgage on their home in order to pay for legal fees to her lawyers for her defense. After her conviction, her family was totally devastated, especially knowing that she is innocent of the accusations. During these three months of her incarceration awaiting sentencing, her family has been falling apart. Her husband is going through a major depression and has become ill. Her children are devastated. They are all very emotionally attached to her.

Noemie is a good person. She does not deserve this fate. Her big mistake was to naively believe those con artists and fall for these scams like the other investors did. She gained nothing and she is losing everything she had.

Thus, Your Honor, I plead with you to be lenient in sentencing her.

Thank You.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Lily Sarkissian', with a stylized, cursive script.

Lily Sarkissian

Exhibit E

John Najarian, PhD.
4 Diana Court
Ramsey, NJ 07446-1527

1/11/11

Honorable Sir:

This is a letter of reference attesting to the character of Noemie Dodakian.

I am writing this at the request of my brother-in-law, Aram Dodakian, who is her husband.

Noemie is my sister and has been for the duration of my life.

I am a university professor for approximately 25 years. I am residing in New Jersey.

I have always observed her to be honest and concerned about the health and welfare of others. She devoted much of her time to her children's education. Her daughter is accomplished in violin playing and academics thanks to countless hours she dedicated to her education, graduating recently from Vassar. She was likewise supportive in her son's education. He is going on to pursue a career as a Physician's Assistant.

She helps take care of her mother, a stroke victim. She also dedicated much time and effort taking care of her mother-in-law and father-in-law (both now deceased).

She had been an active church member. Both in her period of residence in South Jersey and then later in Connecticut, she has been a member in Baptist, other Protestant, and Armenian Orthodox churches, contributing and participating as occasion permitted.

In distant years past, when our father died, she helped supervise the daily household activities while our mother went to work. She always had a benevolent and enlightening nature, promoting scholastic excellence and later theological perspectives.

She taught me art, chemistry, French authors, and many other subjects by opening books and then giving expositions, page by page. She dedicated her time and energies to help illuminate and instill an appreciation of humanities and sciences.

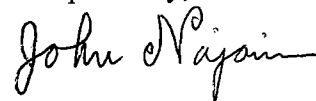
When she married, we would occasionally visit, on holidays. In the last few years, due to her involvement in these financial programs, she was less accessible and seemed somewhat estranged in that she appeared always on cell-phone and laptop, even when being visited or in company. It appeared like some obsession, always talking business-like but without substance and filled with tenuous religious expressions.

I herewith make a plea for clemency in her behalf because:

1. her estranged behavior made her less accessible these last five years.
2. in the domain of investments and finance, she lacks sufficient judgement to properly weigh the real versus the speculative. She cannot distinguish between a promise of return and an actual payment.
3. she reasons in a world of hopes and wishful thinking rather than effective finances. The fact that anyone else believed these programs shows that these programs can make victims out of any gullible person. She is a victim as they were.
4. she has no significant background in finance and never pretended to have one.
5. she naively mixed theology with some pathetic investment schemes that made no sense.
6. she wasted years of her life on this nonsense, becoming progressively more estranged to family and relatives. We saw little of her as she consumed all her time in delusional altruism and imagining returns from false investments. Tragically she believed in these programs. Even the most menial labor job at minimal wage is preferable to making nothing and wasting 24 hours per day on it.
7. Consider how much suffering her family is going through already. Her husband is suffering severe depressions and torment every day. Her children are distraught with grief and pain. Her family will be losing the home they live in. Their home is a house earned from many (over 30) years of Aram's hard work (in the computer industry, programming, and IT). He worked at top industries (United Technologies, Singer, Phizer...) and has two graduate degrees from top-notch universities. Despite working extended weeks and excellent pay, he will be losing his house and is in debt now just from these proceedings.
Does he deserve this? Do the kids deserve this?
Their immediate family is shattered and soon desolate.
8. Based upon objective assessment of her bizarre situation, Noemie essentially earned minimal to no profit. Aram's income is sufficient to account for all their expenses, He is earning the household's incomes. Just check their family financial records. Even a cursory job at forensic accounting would show Noemie's contribution is non-existent to negligible.

However miserable this enterprise must be, she was transferring funds and thinking she was doing good in some unfathomable deluded way. That she was mixing religious misconception with voodoo economics is clear evidence that she had no idea of the level to which she was duped. This whole situation is a tragedy wherein she wasted years of her life, spending more time as a victim of these schemes.

Respectfully,



John Najarian

Exhibit F

181 Viscount Drive
Williamsville, NY 14221
December 6, 2010

Honorable Leonard Sand
U.S. District Court Judge
500 Pearl Street
New York, N.Y. 10007

Re: Leniency Request for Noemie Dodakian

Honorable Sir:

Noemie Dodakian is my aunt by way of marriage to my uncle Aram Dodakian. My sister forwarded my uncle's request to ask for leniency on behalf of my aunt, which I do whole-heartedly. I am a married homemaker raising my two adolescent children; prior to this, I spent 24 years working full-time in computer science. My last position was manager of information technology at Corning Inc.

I have known Noemie for over forty years. Quite a long time, I think, to be able to judge one's character. My family visited my uncle and aunt often. My aunt was always the gracious host and cooked big meals for us all. I have not seen my aunt much since moving to the Buffalo area eight years ago.

Noemie took great care of my grandmother, Paris Dodakian, for many years, from the time my grandmother immigrated to this country in the late 1970s until her death in 2003. My grandmother was severely arthritic. She arrived in this country barely able to walk and worsened to the point of being wheelchair-bound with the use of only several fingers on each hand. Never once did Noemie complain of caring for her mother-in-law, even though my grandmother had three daughters in this country. Noemie was kind enough to understand that my grandmother was better off with her (my mom is clinically depressed, one maternal aunt lost a long battle with cancer and the other lives far from the rest of the family).

My grandmother was always grateful for Noemie's care. Not many daughter-in-laws would take care of their mother-in-law in such a way, let alone a crippled mother-in-law, in the same house, for twenty-five years. *I think this in itself speaks volumes for Noemie's character.*

Respectfully,


Grace Gilmartin

Exhibit G

January 7, 2011

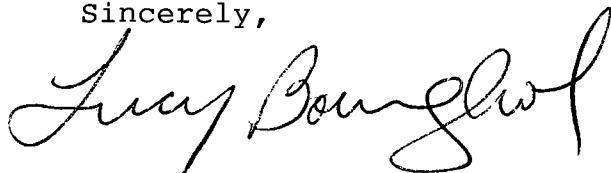
Honorable Sir:

My name is Lucy Bourghol and I am writing this letter on behalf of Noemie Dodakian to plead for leniency in her upcoming sentencing.

I am Noemie's younger sister and growing up she would always take care of me and our younger siblings. She's a wonderful, caring and loving person. She had taken good care of her elderly mother in law and father in law in her own home for many years. More recently, she'd been helping to take care of our 86 year old mother who is a victim of stroke and needs constant care.

I've never known Noemie to intentionally cause any harm to anyone. She totally believed that these investments would bring positive outcomes for everyone involved. Her family is suffering tremendously and her extended absence would be devastating to them. So, please, please consider leniency in her upcoming sentencing. Thank you!

Sincerely,

A handwritten signature in cursive script that reads "Lucy Bourghol". The signature is fluid and elegant, with the first letters of the first and last names being capitalized and prominent.

Lucy Bourghol

Exhibit H

482 Falcon Drive
Martinez, Ga. 30907
Dec. 5, 2010

ROGER L. STAVIS,
Partner
GALLETT DREYER and BERKEY, LLP
ATTORNEY AT LAW
845 Third Avenue, 8th floor
New York, New York 10022 – 6601

Honorable Sir:

I am the niece of Noemie Dodakian. I am a 57 year old housewife and former Registered Nurse. I was asked by my uncle, Aram Dodakian, Noemie's husband, to write this letter to you, asking for leniency.

I have known Aunt Noemie since I was 17 years old. I was a bridesmaid at her wedding to my uncle, Aram. She was vivacious and generous and always surrounded by lots of family members and friends.

For all the years I've known Aunt Noemie, I've noticed that she's hardworking and generous. She always gave her guests lots of hospitality and made great banquets. She even took excellent care of my grandparents, Arakel and Paris Dodakian, for all the years they lived with her and Uncle Aram. Aunt Noemie took especially great care of my grandma Paris who had crippling arthritis and hip surgeries. She did the work of a private aide, ministering to her every need daily, until the day she died.

Besides having been a caring daughter-in-law, she is also a very caring mother of two children. She especially appreciates having them after years of infertility and miscarriages. She is also a caring sister to her two brothers and two sisters, one of which was suddenly widowed a few years ago. She is also a caring daughter to her mother who had a stroke a couple of years ago.

Aunt Noemie also made extra money from home by selling products for companies such as Nikon.

I know that in the year, 2005, she was deceived by telephone into a making money from home scheme. She trusted the callers because they said it's an investment with high returns and that successful people like lawyers and doctors were involved in it. She thought she could make extra money from home since Uncle Aram was not able to always find employment. She trusted the people who made the claims and went to work to get investors.

Now she knows it was a fraud and that she was an unfortunate victim. Frauds like this are something we all have to be aware and cautious of.

I can understand the need for the money lost by her investors to somehow be made up for. But she too, like her investors, are all victims of this massive fraud. She should not

be punished by imprisonment especially since the real perpetrators of this crime are unknown and unapprehended.

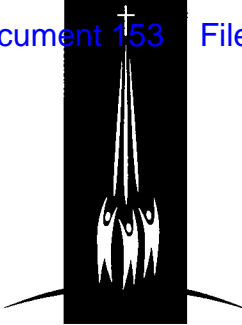
I ask for leniency for Noemie Dodakian to return home to her family, friends and community, where she can get on with her life, learning from this terrible experience to be careful who she trusts.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marie Murro".

Marie Murro

Exhibit I



December 22, 2010

**FIRST
ASSEMBLY
of GOD**

Roger L. Stavis
Partner, Gallett Dreyer & Berkley, LLP
Attorney at Law
845 Third Avenue – 8th Floor
New York, NY 10022-6601

To Whom It May Concern:

I am writing this letter at the request of Aram Dodakian. As the Associate Pastor of First Assembly of God in Brookfield, CT, I have known Noemi Dodakian since August of 2010. During that time, I have experienced her as a woman of deep faith, and a profound trust in God.

At all times she has maintained that she was horrified that the work she was doing was not above-board. She was trying to help individuals to better themselves. I believe her, that her involvement in the business that has brought her conviction was with the best intentions for the investors, and not for her personal gain.

Noemi has always presented herself as sincere and trustworthy in all of my dealings with her.

I would respectfully request leniency in her sentencing.

Thank you for your consideration in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Alfred F. Van Geersdaele". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Rev. Alfred F. Van Geersdaele

Rev. Philip A. Morgan
Senior Pastor

133 Junction Road, Brookfield, CT 06804
p (203) 775-5191 f (203) 775-8486
email: church@brookfieldfirst.org
www.brookfieldfirst.org

Exhibit J

22 Robin Hood Rd.
Danbury, CT 06811
December 29, 2010

ROGER L. STAVIS, Partner
GELLETT DREYER & BERKEY, LLP
ATTORNEY AT LAW
845 Third Avenue- 8th Floor
New York, NY 10022-6601

Honorable Sir,

I am Florence Pilkington a senior citizen, attending Western Connecticut State University, working toward a degree in studio Art.

Aram Dodakian asks if I would be willing to write a letter of favorable references about Noemie Dadakian.

I became acquainted with Noemie in the seventies and again in 2003-2010 by attending the same church. I was never fully aware of the charges till November 11, 2010.

During the seventies found Noemie to be friendly and a faithful person. Every week she brought her elderly in-laws to church. When we renewed acquaints in two thousand, found her kind, compassionate and loving. She had a desire to connect with people and found her honest in all her ways.

I believe Noemie is entitled to leniency because of her long life time of honesty, reliable and tender heartedness.

Sincerely,


Florence Pilkington

Exhibit K

Virginia R. Vassak
704 Titicus Rd.
North Salem, NY 10560

December 18, 2010

Dear Honorable Sir,

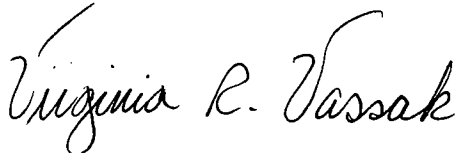
My name is Virginia Vassak, and I am writing on behalf of Noemie Dodakian. I am a retired bookkeeper, my husband and I have been married for over 50 years, and we reside in Westchester County, NY.

I first met Noemie 25 years ago in church in Ridgefield, CT, and knew her well, though we have had only casual contact for the last 15 years. I have always known her to be a compassionate, considerate, sincere person, and a loving and caring mother and wife. I know her to be someone who is always willing to help people. For example, when I first met Noemie, she had welcomed her elderly mother-in law into her own home, and cared for her until her mother-in-law's death in 2004. I also know her to be a generous person, faithful and liberal in her giving to her church and to people in need. She has a very kind and sweet spirit,, and demonstrates genuine concern for people.

I have only learned within the last two weeks about Noemie's conviction, when her husband Aram Dodakian requested that I write this letter. I must say that I was astounded at the news, as this is completely out of character for what I have known of Noemie. I am persuaded of Noemie's good character and integrity, and I have no doubt that if she is given the opportunity, that she possesses the tools and the support necessary to once again be a productive member of her community and her society.

If I can be of any further help in this matter please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Virginia R. Vassak". The signature is written in a cursive, flowing style with a large initial 'V'.

Virginia R. Vassak

Exhibit L

Noelline Morin
12 Neds Lane
Ridgefield, CT 06877

January 19, 2011

ROGER L. STAVIS
Partner
GALLETT DREYER & BERKEY, LLP
ATTORNEY AT LAW
845 Third Avenue – 8th Floor
New York, NY 10022-6601
Telephone 212-935-3131
Facsimile: 212-915-4514
e-mail: rls@gdblawn.com

RE: NOEMIE DODAKIAN

To whom it may concern,

I first met Noemie Dodakian several years ago (about 28years) while we were attending the same church. She was a school teacher at the time.

Since then our paths have crossed from time to time. I have known Noemie to be a very friendly, optimistic, helpful, loving and caring person. She is very generous with her time, she taught me a lot about nutrition and vitamins even provided some products. She also visited my brother who was struggling with health issues at the time, tried to help him out even shared her equipment so he would be more comfortable and help improve his condition. She always was more than willing to help whenever I had health related questions.

I also have known Noemie to be a good mother, devoting her time to her family and her mother in law with whom she shared her house for many years. Noemi did all she could to help relieve her mother in law's pain due to arthritis.

Although we parted ways in the last few years, I keep a fond memory of her.

Sincerely,




Exhibit M

Elene Mitchell
P.O. Box 329007
Brooklyn, NY 11232

January 12th, 2011

to Whom It May Concern:

RE: United States vs Noemie Godakian

Your Honor,

Please receive this letter of recommendation on behalf of Mrs. Godakian.

It is a great privilege for me to be able to speak on behalf of Mrs. Noemie Godakian. I have been at NDC for three years now and I take care of the religious services on the female unit, it is not often that I have the privilege to be next to someone like Mrs. Godakian.

I give God glory for blessing us with her presence.

I have the blessing of hosting Bible study class, praise and worship services with Ms. Sodakian. She is a true blessing to the women on the unit and myself.

I do not know the details involving her legal situation, but what I know is that has used her to be a blessing to the people around her.

I highly recommend Ms. Helmine Sodakian for serious consideration of being reunited with her family and friends by the court.

Most sincerely,
Elena Hittel

Exhibit N

Dear Honorable Judge Feb 23, 2011

How are You? My name is Sherrell Footman. I am an inmate at MDC, I have been there since Sister Noemi came in December. I go to Church Services with her. Ever since I have met Sister Noemi she has really inspired me and encouraged me to do better for my children and to take good care of my children. She has also been teaching me how to read better because I have dyslexia. We are using the Holy Word of God, The Bible as our book. She has also been helping the other women here in uplifting and encouraging them. To me Sister Noemi is like a mother that I never had and she is a beautiful soul with a beautiful heart who really does care about other people in their lives. Me being a mother of three knowing how much my children and family need me. I know that her husband and children need her too, especially her husband who has become very sick. We have been praying for him. Sister Noemi has been a blessing to me. I look up to her as a holy woman of God. We young women in this world need more people like her.

Respectfully Sherrell Footman
Thank You